

**Sealed**

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United States Courts  
Southern District of Texas  
FILED

*June 16, 2020*

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

David J. Bradley, Clerk of Court

HOUSTON DIVISION

UNITED STATES OF AMERICA	§	CRIMINAL NO.
	§	
vs.	§	<b>4:20-cr-259</b>
	§	
JORGE RANGEL CHARLES	§	<u><b>UNDER SEAL</b></u>
and	§	
ANDREA MARIE VASQUEZ,	§	
Defendants.	§	

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT 1**

Title 18, United States Code, Sections 641, 2  
Aiding and Abetting Theft of Government Property

On or about May 26, 2020, in the Houston Division of the  
Southern District of Texas,

JORGE RANGEL CHARLES  
and  
ANDREA MARIE VASQUEZ,

defendants herein, aiding and abetting each other and others known  
and unknown to the Grand Jury, did knowingly embezzle, steal,  
purloin, and convert to their use or the use of another, a thing  
of value of the United States or of any department or agency  
thereof, to wit: the Naval Criminal Investigative Service,

government property, to wit: a 2019 Chevrolet Tahoe; a Colt, MK-18, fully automatic rifle; a Colt, M-4, fully automatic rifle; a Knights armament suppressor; night vision optics for a sniper rifle; and two (2) ballistic vests marked "Special Agent NCIS" on the back and "Police" on the front, all of which have a value greater than \$1,000.

In violation of Title 18, United States Code, Sections 641 and 2.

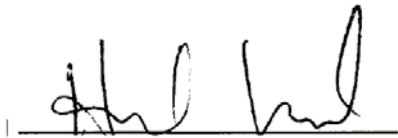
A TRUE BILL

Signature on file

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FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
United States Attorney

A handwritten signature in black ink, appearing to read "Ryan K. Patrick", is written over a horizontal line.

By:

HEATHER RAE WINTER  
Assistant United States Attorney